

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2017 Electric
Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

Application 16-04-018
(Filed April 15, 2016)

**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
TO SEAL A PORTION OF THE EVIDENTIARY RECORD**

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November 17, 2016

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Application of SAN DIEGO GAS & ELECTRIC
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**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
TO SEAL A PORTION OF THE EVIDENTIARY RECORD**

Pursuant to Rule 11.5 of the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) respectfully submits this motion to seal a portion of the evidentiary record in this proceeding. Concurrently with this motion, SDG&E is filing a motion under Rule 13.8 to offer prepared testimony and appendices into evidence in this proceeding.

By this motion, SDG&E moves the Commission for an order granting confidential treatment to certain information identified by shading in the confidential version of the following exhibits (or attachments thereto):

1. Exhibit SDG&E-1C – Direct Testimony of Monica Vazquez Chihwaro - Confidential;
2. Exhibit SDG&E-2C – Direct Testimony of Ana Garza-Beutz - Confidential;
3. Exhibit SDG&E-3C – Direct Testimony of Benjamin A. Montoya- Confidential;
4. Exhibit SDG&E-4C – Direct Testimony of Norma Jasso- Confidential; and
5. Exhibit SDG&E-5C – SDG&E 2016 ERRRA/GHG November Update to Prepared Testimony – Confidential (Vazquez Chihwaro, Garza-Beutz, Montoya, and Jasso).

6. Attachment G to the above-captioned Application (the GHG Revenue and Reconciliation Application Form) and to the November Update.

When this testimony was originally prepared – in April, as updated in November – SDG&E filed a contemporaneous Motion for Leave to File Confidential Materials Under Seal, Confidential Materials Attached and Filed Under Seal. In addition, each witness who sponsored confidential material included a confidentiality declaration with their testimony and appropriately marked the confidential material. Separate public versions (with confidential materials redacted) were also prepared.

SDG&E has served confidential versions of the foregoing exhibits on the presiding Administrative Law Judge and representatives of the Office of Ratepayer Advocates, and it has served public versions of this testimony, in which confidential information was redacted, on other parties to this proceeding, and/or those public versions have been made available upon request.

In Decision (“D.”) 06-06-066 and D.08-04-023, the Commission set forth standards for designating information as confidential in Commission proceedings. As part of those decisions, the Commission set forth in the attached Appendix 1 to D.06-06-066 a matrix that identified several categories of data and the level of confidentiality granted to each category. Specifically, the Commission stated in Ordering Paragraph 2 that “[w]here a party seeks confidentiality protection for data contained in the Matrix, its burden shall be to prove that the data match the Matrix category. Once it does so, it is entitled to the protection the Matrix provides for that category.”¹

Here, SDG&E is seeking confidential protection of certain confidential information contained in the above-referenced exhibits. This information, which has been shaded in the

¹ D.06-06-066 at 80.

confidential versions of the exhibits, has been determined to be confidential by the Commission pursuant to the D.06-06-066 matrix and D.08-04-023. Each confidential version of the testimony contains the respective witness' declarations explaining which aspects of their testimonies (or Attachment G) are confidential under the Commission's requirements.

Respectfully submitted,

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